

Ortiz & O'Donnell
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 United States
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Ortiz & O'Donnell

Invoice

Invoice #	00028
Invoice Date	July 15, 2013
Due Date	
Balance Due	\$13,037.15
Payment Terms	
Case / Matter	Carroca v. All Star Enterprises and Collision Center, Inc. et al.

Derek Carroca

Time Entries

Date	EE	Activity	Description	Rate	Hours	Line Total
06/13/2012	NFO	Drafting Complaint	Drafting Complaint	300.00	1.4	420.00
06/23/2012	NFO	Case Administration	Filing Complaint	300.00	0.2	60.00
07/16/2012	NFO	Drafting Complaint	Amending complaint	300.00	0.7	210.00
08/14/2012	NFO	Phone Call	Call to Court re Default	300.00	0.3	90.00
08/14/2012	NFO	Research	Need for Service of Amended Summons	300.00	0.3	90.00
08/15/2012	NFO	Correspondence	Call to Lisa Hourihan at Fed Crt, 617-748-9177, getting amended summons	300.00	0.1	30.00
08/15/2012	NFO	Research	Researching asserted exemption-- Defendant is a bodyshop, not a dealership-- not exempt	300.00	0.6	180.00
08/15/2012	NFO	Case Administration	Reviewing Answer against complaint; tracking admissions. Admits overtime and enterprise/employer status.	300.00	0.4	120.00
08/15/2012	NFO	Phone Call	Call to client re whether defendants sold cars and, if so, where and how much of their business	300.00	0.2	60.00
09/04/2012	NFO	Case Administration	Drafting joint statement and settlement offer as required by LR 16.1	300.00	1.1	330.00
09/07/2012	NFO	Correspondence	Call with Attorney Conn - 26f conference	300.00	0.2	60.00
09/13/2012	NFO	Correspondence	Call to OC re where is the joint statement?	300.00	0.1	30.00
09/13/2012	NFO	Case Administration	Reviewing draft joint statement sent by defendant, emailing OC re same	300.00	0.3	90.00
09/17/2012	NFO	Correspondence	Call from OC re rescheduled status conf.	300.00	0.1	30.00
09/20/2012	NFO	Court Hearing	Travel to Attendance at Status Conference	300.00	1.8	540.00
09/20/2012	NFO	Research	Exemption research: "salesman, partsman, or mechanic primarily engaged in selling or servicing automobiles, trucks, or farm implements, if he is employed by a nonmanufacturing establishment primarily engaged in the business of selling such vehicles or implements to ultimate purchasers"	300.00	0.6	180.00

09/21/2012	NFO	Correspondence	Drafting letter to OC re settlement and exemption	300.00	0.7	210.00
09/21/2012	NFO	Drafting	Drafting initial disclosures	300.00	0.4	120.00
10/01/2012	NFO	Case Administration	Reviewing defendant's disclosures, building spreadsheet with payroll records	300.00	0.9	270.00
10/01/2012	NFO	Case Administration	Building spreadsheet with claimed amounts	300.00	0.8	240.00
10/01/2012	NFO	Correspondence	Call with client re disclosures	300.00	0.2	60.00
10/01/2012	NFO	Correspondence	Emailing client summary of OT claim, etc	300.00	0.1	30.00
10/05/2012	NFO	Case Administration	Updating settlement demand; drafting letter re same to OC	300.00	0.4	120.00
10/05/2012	NFO	Drafting	Drafting first set of interrogatories	300.00	0.8	240.00
10/05/2012	NFO	Drafting	Correcting interrogatories	300.00	0.3	90.00
10/15/2012	NFO	Case Administration	Reviewing discovery requests	300.00	0.4	120.00
10/15/2012	NFO	Correspondence	Call with client re discovery	300.00	0.4	120.00
11/06/2012	KAR	Research	Read & review pleadings and discovery requests in preparation for responses	300.00	0.4	120.00
11/06/2012	KAR	Drafting	Draft responses to discovery demands	300.00	0.4	120.00
11/08/2012	KAR	Drafting	draft responses to discovery requests	300.00	0.2	60.00
11/08/2012	NFO	Case Administration	Emailing re discovery and tax return issue	300.00	0.3	90.00
11/09/2012	KAR	Drafting	draft response to interrogatories	300.00	0.3	90.00
11/09/2012	KAR	Drafting	draft interrogatories response	300.00	0.3	90.00
11/09/2012	KAR	Drafting	draft response to interrogatories	300.00	0.7	210.00
11/09/2012	KAR	Drafting	draft interrogatory response	300.00	0.6	180.00
11/12/2012	KAR	Drafting	draft response interrogatories	300.00	0.4	120.00
11/12/2012	NFO	Correspondence	Responding to Atty Rostedt re discovery	300.00	0.1	30.00
11/14/2012	KAR	Phone Call with Client	phone call w/ client re interrogatories	300.00	0.1	30.00
11/14/2012	KAR	Drafting	draft response to interrogatories	300.00	0.6	180.00
11/14/2012	KAR	Drafting	draft response to interrogatories	300.00	0.3	90.00
11/14/2012	KAR	Correspondence	draft correspondence to client re: response to interrogatories	300.00	0.1	30.00
11/16/2012	NFO	Correspondence	Call with Atty Rostedt re Caroca discovery-serve discovery answers even though they did not service answers and refuse to talk to us?	300.00	0.3	90.00
11/19/2012	KAR	Research	review & compare discovery requests in connection with response	300.00	0.2	60.00
11/19/2012	KAR	Drafting	draft response production of documents	300.00	0.1	30.00
12/03/2012	KAR	Drafting	draft cert of service for discovery responses	300.00	0.1	30.00
12/03/2012	KAR	Correspondence	draft letter to OC re: discovery responses	300.00	0.1	30.00
12/14/2012	NFO	Case Administration	Reviewing answers to Ints; research re exemption claim	300.00	0.7	210.00
12/17/2012	KAR	Drafting	begin drafting motion for summary judgment	300.00	0.2	60.00
12/17/2012	KAR	Research	research for summary judgment motion	300.00	0.5	150.00

12/18/2012	KAR	Drafting	draft motion summary judgment	300.00	1.2	360.00
12/18/2012	NFO	Correspondence	Responding to Atty Rostedt inquiry re garageman claim	300.00	0.2	60.00
12/18/2012	KAR	Drafting	draft motion summary judgment	300.00	0.8	240.00
12/18/2012	KAR	Drafting	draft motion summary judgment	300.00	0.1	30.00
12/18/2012	NFO	Correspondence	Drafting email to Atty Rostedt re outline for motion for summary judgment	300.00	0.3	90.00
12/19/2012	KAR	Drafting	draft memo of law in support of motion summary judgment	300.00	1.5	450.00
12/19/2012	KAR	Drafting	draft memo of law in support motion summary judgment	300.00	0.2	60.00
12/20/2012	KAR	Drafting	draft memo of law in support motion summary judgment	300.00	0.5	150.00
12/20/2012	KAR	Drafting	draft memo law in support motion summary judgment	300.00	0.5	150.00
12/20/2012	KAR	Drafting	draft memo of law in support motion summary judgment	300.00	0.4	120.00
12/20/2012	KAR	Drafting	draft attorney affirmation to accompany motion summary judgment; review draft of memo of law	300.00	0.5	150.00
12/21/2012	NFO	Drafting	Editing motion for summary judgment	300.00	0.3	90.00
12/21/2012	NFO	Drafting	Reviewing and editing MSJ - adding thoughts re damages component	300.00	0.4	120.00
12/26/2012	KAR	Research	reviewing discovery to calculate damages for summ j motion	300.00	0.4	120.00
12/27/2012	KAR	Research	research issue of state v federal damages for motion summary judgment	300.00	0.5	150.00
12/27/2012	KAR	Research	research in connection with summary judgment motion	300.00	0.8	240.00
12/27/2012	NFO	Drafting	Outlining Summary Judgment argument	300.00	0.6	180.00
12/27/2012	KAR	Drafting	draft summary judgment motion	300.00	1.7	510.00
12/28/2012	NFO	Drafting	Drafting motion for summary judgment	300.00	0.7	210.00
12/28/2012	NFO	Drafting	Drafting motion for summary judgment	300.00	1.1	330.00
12/29/2012	KAR	Drafting	finalize attorney affirmation & exhibits for summary judgment motion	300.00	0.3	90.00
12/29/2012	NFO	Drafting	Drafting Motion for Summary Judgment	300.00	1.7	510.00
12/29/2012	NFO	Drafting	Drafting and filing LR 56.1 statement	300.00	0.8	240.00
01/18/2013	NFO	Correspondence	Responding from OC message with email	350.00	0.1	35.00
01/18/2013	KAR	Case Administration	read & review defendants' opposition papers to motion for summary judgment	300.00	0.1	30.00
01/18/2013	NFO	Correspondence	Reviewing defendants opposition, taking notes for hearing	350.00	0.5	175.00
01/24/2013	NFO	Correspondence	Drafting email to Opposing Counsel re defendants' failure to make sanctions payment	350.00	0.2	70.00
01/25/2013	NFO	Drafting	Drafting motion for further sanctions	350.00	0.5	175.00
07/09/2013	NFO	Correspondence	Emailing clerk re setting a hearing on motion	350.00	0.2	70.00

07/11/2013	NFO	Case Administration	Reviewing Court order granting SJ	350.00	0.2	70.00
07/11/2013	NFO	Correspondence	Email to OC re settlement possibility	350.00	0.2	70.00
07/12/2013	NFO	Drafting	Drafting Fee Application	350.00	0.7	245.00
07/13/2013	NFO	Drafting	Drafting Fee Application	350.00	0.7	245.00
07/14/2013	NFO	Drafting	Drafting fee application	350.00	0.7	245.00
07/15/2013	NFO	Drafting	Drafting fee application	350.00	0.2	70.00
07/15/2013	NFO	Drafting	Editing and filing fee application	350.00	0.6	210.00
Non-billable Time Entries:						
11/12/2012	NFO	Correspondence	Drafting and emailing FRCP 37 request for conference to OC re lack of responses to Ints	300.00	0.3	90.00
11/13/2012	NFO	Correspondence	Contacting OC re failure to make discoveryy-left phone message and sent email	300.00	0.2	60.00
11/20/2012	NFO	Drafting	Drafting motion to compel discovery	300.00	1.3	390.00
11/21/2012	NFO	Drafting	Editing and filing motion to compel discovery	300.00	0.4	120.00
12/15/2012	NFO	Drafting	Drafting and editing verified motion for attorneys' fees	300.00	1.6	480.00

Time Entry Total: **\$12,600.00****Expenses**

Date	EE	Activity	Description	Cost	Quantity	Line Total
07/03/2012	NFO	Filing Fee	Filing Fee	350.00	1.0	350.00
07/06/2012	NFO	Service	Service of Complaint	60.00	1.0	60.00
09/22/2012	NFO	Expense (Misc)	Taxi to court	12.75	1.0	12.75
09/22/2012	NFO	Expense (Misc)	Taxi from court	14.40	1.0	14.40

Expense Total: **\$437.15**

Time Entry Sub-Total:	12,600.00
Expense Sub-Total:	437.15
Sub-Total:	13,037.15
Total:	13,037.15
Amount Paid:	0.00
Balance Due:	\$13,037.15